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March 1, 2018
Via ECFS Filing

Ms. Marlene H. Dortch, FCC Secretary
Federal Communications Commission
9050 Junction Drive
Annapolis Junction, MD 20701

RE: Talton Communications, Inc. – 499 Filer ID 828095
CY 2017 CPNI
EB Docket No. 06-36

Dear Ms. Dortch:

Attached for filing is the Calendar Year 2017 CPNI Compliance Certification and Statement of CPNI Procedures and Compliance as required by 47 C.F.R. Section 64.2009 (e) submitted on behalf of Talton Communications, Inc.

Any questions you may have regarding this filing should be directed to my attention at 407-740-3005 or via email to swarren@inteserra.com. Thank you for your assistance in this matter.

Sincerely,

/s/ Sharon R. Warren

Sharon R. Warren
Consultant

cc: Robin Howell – Talton (via Email)
tms: FCx1801

Enclosures
SW/sp

ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE

EB DOCKET 06-36

Annual 64.2009(e) CPNI Certification for:	Calendar Year 2017
Name of Company covered by this certification:	**Talton Communications, Inc.**
Form 499 Filer ID:	828095
Name of Signatory:	Michael Oslund
Title of Signatory:	President

I, Michael Oslund certify that

1. I am President of Talton Communications, Inc. and, acting as an agent of the Company, that I have personal knowledge that the Company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See* 47 C.F.R. § 64.2001 *et seq*.

2. Attached to this certification, as Exhibit A, is an accompanying statement explaining how the Company's procedures ensure that the Company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in Section 64.2001 *et seq.* of the Commission's rules.

3. The Company has not taken any actions (i.e., proceedings instituted or petitions filed by the Company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

4. The Company has not received any customer complaints in the past year concerning the unauthorized release of CPNI.

5. The Company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The Company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Michael Oslund
President

2-28-18
Date

Attachments: Accompanying Statement explaining CPNI procedures – Attachment A

Attachment A
Statement of CPNI Procedures and Compliance

Talton Communications, Inc.

Calendar Year 2017

STATEMENT REGARDING OPERATING PROCEDURES
IMPLEMENTING 47 C.F.R. SUBPART U
GOVERNING USE OF
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI)

The following statement explains the internal procedures of Talton Communications, Inc. ("TALTON") to ensure that it is in compliance with the Commission's CPNI rules.

TALTON provides telecommunications services to inmates in local, state, and federal prison facilities. As part of those inmate services, TALTON may provide interstate and/or international long distance services, as well as local and intraLATA toll services. TALTON only provides these services to inmates via contractual arrangements with the various prison administrations (Subcontracts), such as police departments, Sheriff's departments, state Departments of Correction (DOC), and the Department of Homeland Security-Immigration and Customs Enforcement (DHS-ICE).

A large part of TALTON's business is made up of its Subcontract with the DHS-ICE. Under the DHS-ICE Subcontract and a number of other TALTON correctional contracts, the customer data is the property of the government agency administering the prisons. Thus, TALTON is not permitted to access this information for marketing purposes and, in fact, follows several protocols to protect such information on behalf of the correctional facility. As part of the DHS-ICE Subcontract, TALTON must comply with certain security standards for customer data applicable to government contractors, such as the following:

- National Institute of Standards and Technology -NIST Special Publication 800-53 Information Security
- Federal Information Technology Security Policy -OMB Circular A-130 management of Federal Information Resources
- Department of Justice Program (DOJ) Management Policy -DOJ 2640.20 Information Technology Security

Because a large part of TALTON's business is made up of its Subcontract with DHS-ICE, the processes, procedures, and physical hardware to comply with the above government security standards are also used in connection with TALTON's protection and handling of customer data. Some key aspects of TALTON's customer data security are:

- Need to Know—TALTON only allows employee access to customer information on a need-to-know basis. All of TALTON's employees who deal with DHS-ICE 'customer' data must take and pass a federal background check as administered through the Department of Homeland Security.
- Physical Security—TALTON maintains a single physically secure facility for the storage of all customer data. Customer data is also maintained for each prison facility inside the prison itself, each prison having its own but effective physical security.
- Computer Security—TALTON, through its partnership with Telmate, maintains a secure data infrastructure accessible by authorized personnel only.

- Network Security—TALTON, through it’s partnership with Telmate, maintains a NIST compliant data network infrastructure.
- No Marketing—TALTON does not use any of the 'customer' data for any marketing or sales purposes. While most of the 'customer' data is not owned or handled by TALTON, what little 'customer' data TALTON does handle is not, and is not planned to be, used for any marketing or sales purpose.

TALTON's operating procedures are designed to ensure consumer information is protected in compliance with section 222 of the Communications Act. Further, in light of TALTON's status as a government contractor, the Company also institutes a number of strict information security measures designed to comply with the aforementioned government imposed standards and provide a high level of security for customer data.

TALTON uses CPNI internally for the purpose of providing telecommunications services. TALTON also uses CPNI internally for the following actions:

(1) to bill and collect for services rendered;

(2) to protect the rights or property of TALTON, or to protect its users and other carriers from fraudulent, abusive, or unlawful use of, or subscription to, TALTON's services.

(3) to provide investigative data for the prison governmental administration in their investigative and security responsibilities over the inmates and prisons in question.

TALTON procedures require that CPNI be used only for the purposes identified above. Customer approval is not required for these uses of CPNI as they are specifically permitted by statute or Commission rule.

TALTON employees are trained to secure CPNI and related confidential information. TALTON does not sell, disclose or otherwise distribute CPNI to third parties outside of its own activities. All customer "End-User" accounts are password protected and information is not released or accessed until the customer confirms their identity. Call detail is not accessibly by phone or online even with password confirmation. TALTON does not implement any externally requested changes to the customers account without the customer requesting the change by either electronic mail or phone call. Changes are implemented only after customer confirms their identity.

TALTON has procedures in place to notify law enforcement and customers within seven (7) days of any breach of CPNI. Records will be maintained with detailed information of the breach and notification process.

TALTON has not had to take action against any pretexter/data brokers in the past year. TALTON has procedures in place and will report any information that they have with respect to the processes that are being used to access CPNI.

TALTON did not receive any complaints regarding the unauthorized release of CPNI for January 01, 2017 through December 31,2017.